

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SUPPRESSED  
FILED

AUG 22 2019

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

EARL WATKINS,

Defendant.

**4:19CR00697 SRC/SPM**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about July 23, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**EARL WATKINS,**

the Defendant herein, did knowingly and intentionally possess with intent to distribute methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO**

The Grand Jury further charges that:

On or about July 23, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**EARL WATKINS,**

the Defendant herein, did knowingly and intentionally possess with intent to distribute cocaine base, commonly known as crack, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**

The Grand Jury further charges that:

On or about July 23, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**EARL WATKINS,**

the Defendant herein, knowingly possessed one or more firearms, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

The Grand Jury further charges that:

On or about July 23, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**EARL WATKINS,**

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, possession with intent to distribute methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, and possession with intent to distribute cocaine base, commonly known as crack, a Schedule II controlled substance, as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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Special Assistant United States Attorney